



THE NEW CURRENCY FOR THE NEXT GENERATION

In Just A Few Taps,  
YOU CAN BUY  
Himalaya Coin & Himalaya Dollar.

Demonstration of the crypto ecosystem.

Driven by our mission to give you back the power and redefine currency. We want you to

# Client Onboarding and Compliance Process

Trade anywhere, anytime on the most trusted cryptocurrency exchange.

REGISTER TODAY.



June 2022

Last Price

24h Change

24h Volume

Market



HCN  
Himalaya Coin

41,625 HDO ↓

- 1.65%

157,507.824



TRADE



## Our Team

Here at Himalaya Exchange, we are committed to protect our customers and crypto community.

Himalaya Exchange aims to set the crypto industry standard for Know Your Customers.

Our compliance teams are located in United Kingdom and Australia and provide compliance services to the group.

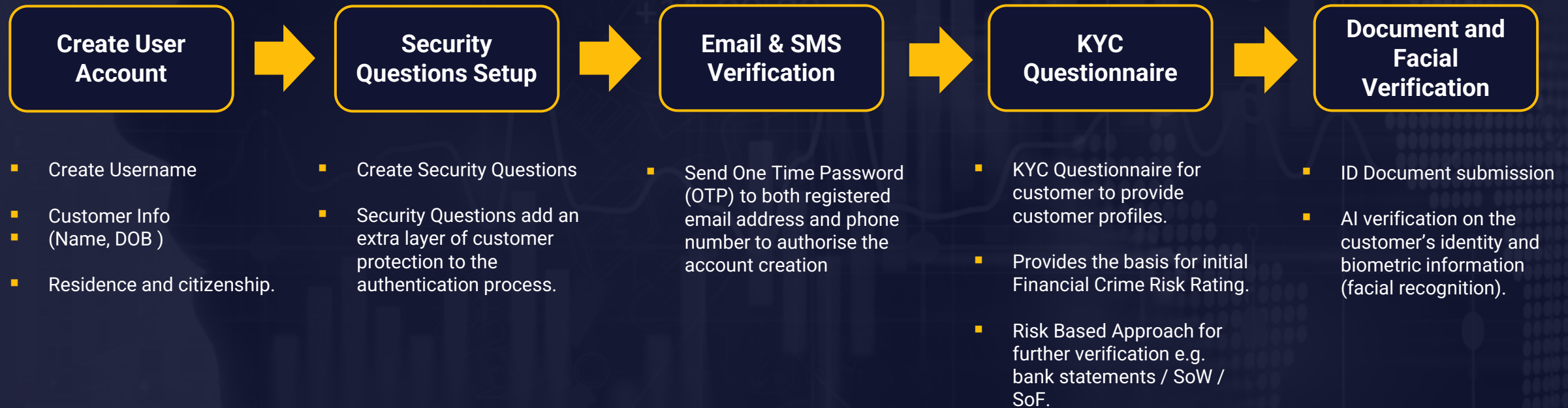
Most of our compliance team members have more than 5 years compliance experience in leading international banks and crypto companies.

## Our CDD Process

- **Customer Registration Process**
- **Identification and Verification**
- **Name Screening**
- **Risk Assessment**
- **Auto Approval, Auto Rejection and Manual Risk Review**
- **Ongoing Due Diligence**



## Customer Registration Process (Individual)







## Customer Registration Process (Corporate)

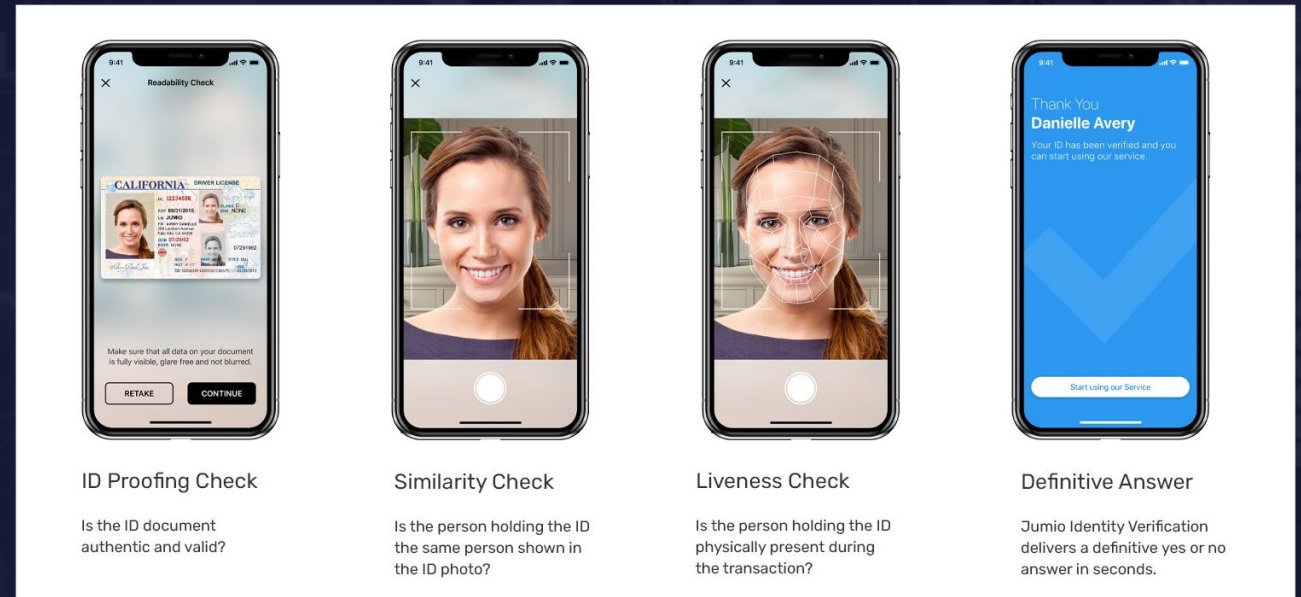


- Appointed Representative registers an account with email address, password.
- Same registration process as Individual including Security Questions setup.
- Based on the result of the Business Risk Analysis, Himalaya Exchange only accepts the following legal entities:
  - Personal Investment
  - Companies (PIC)
  - Corporate and Partnerships
  - Trusts
  - Funds
- Due Diligence is conducted on the corporate entity.
- Key documents to verify the ultimate ownership structure and legal status like:
  - Certificate of Incumbency
  - Board Resolution
  - Organisation Chart, etc .
- Every Corporate customers undergoes EDD regardless of their initial Financial Crime Risk Rating.
- In addition to the main party (the legal entity), the connected parties have to go through complete KYC process and provide POA. For example, UBO with 10% or above ownership, Directors, Authorised Representative. For Trust - Settlor, Protector, Beneficiary, etc.
- For merchant account, an extra due-diligence process will be adopted due to the high risk nature.



## Identification and Verification (ID&V) , Screening

- **Identification and Verification.** Customer provides name, address and relevant data from our secured online portal. Customer's identity is verified against the government issued ID card. AI powered facial recognition is used to ensure the picture in ID matches selfie picture.
- **Proof of Address.** Customer address is manually verified against the bank statement, government ID, and utility bills
- **Name Screening** is performed against PEP (Politically Exposed Person), Sanctions, Adverse Media to fully compliant with AML regulations.





## Business Risk

Risk Identified	Description	Controls in Place	Reflected in Customer Risk Model
Product Risk	<ul style="list-style-type: none"> <li>Crypto Exchange</li> <li>Payment App</li> <li>Merchant</li> </ul>	<ul style="list-style-type: none"> <li>Identification, verification, full KYC data required for all users</li> </ul>	<ul style="list-style-type: none"> <li>Expected deposit level</li> </ul>
Customer Type Risk	<p><b>Individual Customers</b></p> <ul style="list-style-type: none"> <li>Individuals across the globe</li> <li>High Net Worth Individuals</li> <li>PEPs</li> </ul> <p><b>Corporate Customers</b></p> <ul style="list-style-type: none"> <li>Personal Holding Companies</li> <li>Trusts</li> <li>Funds</li> <li>Investment Vehicles</li> <li>Complex Structures</li> </ul>	<ul style="list-style-type: none"> <li>Identification, verification, full KYC data required for all users</li> <li>Name Screening against sanctions, PEP, adverse media</li> <li>Enhanced due diligence for higher risk customers (verification of employment, source of funds)</li> </ul>	<ul style="list-style-type: none"> <li>Risk factors include employment, business sectors</li> <li>Additional risk loading for customer for investment vehicles and complex structures.</li> </ul>
Delivery Channel Risk	Non-Face-to-Face	<ul style="list-style-type: none"> <li>Jumio – Biometric verification against ID photo and selfie taken during onboarding</li> </ul>	
Geographical Risk	<p>Clients with linkage to countries subject to:</p> <ul style="list-style-type: none"> <li>Sanctions</li> <li>AML deficiencies listed by FATF</li> <li>High level of corruption</li> </ul>	<ul style="list-style-type: none"> <li>Certain countries prohibited from registration</li> <li>Risk level assigned to each country according to recognised global organisations (e.g. FATF countries, Transparency International) and regularly updated country risk score based on Corruption Perceptions Index (CPI).</li> </ul>	<ul style="list-style-type: none"> <li>Residence country, citizenship, expected country of origin of funds</li> </ul>





## Risk Model Assessment

### Geography Risk

- Resident Country
- Citizenship
- Fund deposit to / receive from

### Product Risk

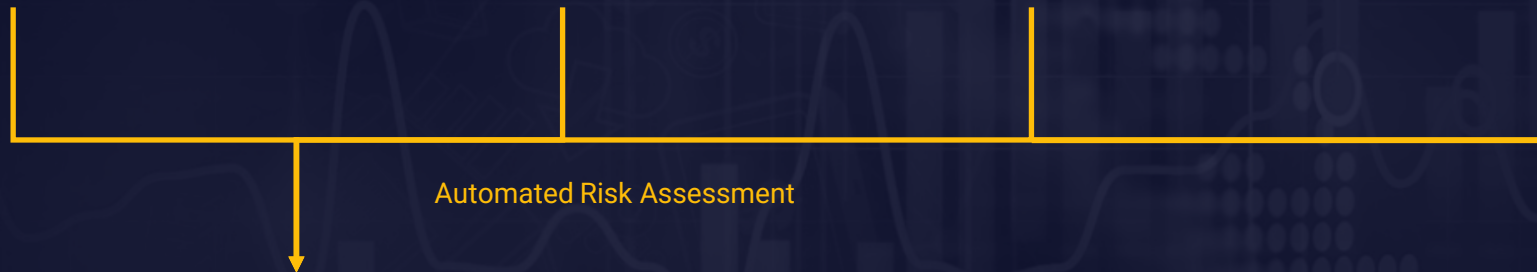
- Crypto Exchange
- Payment Product
- Merchant / Peer-to-Peer

### Transaction Risk

- Planned annual deposit
- Transaction Monitoring

### Customer Risk

- Occupation Status
- Individual or Business Activity Areas



### Final Financial Crime Risk Rating

Score	Classification
0-30	Low
31-59	Medium
60-75	High
75-99	Ultra-High

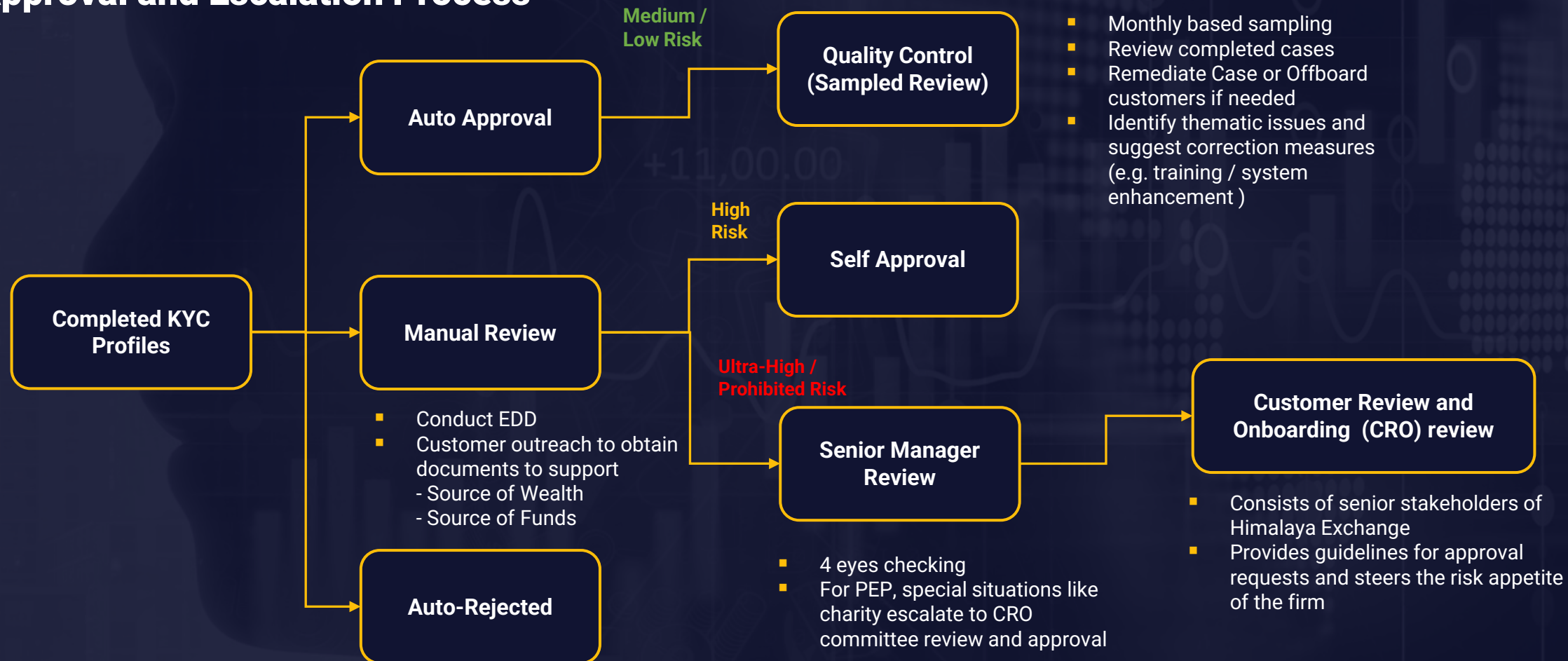
Manual Adjustment

### Fraud Signals

- Sanction List
- PEP Risk
- Adverse Media Coverage
- Red flags from Manual Review



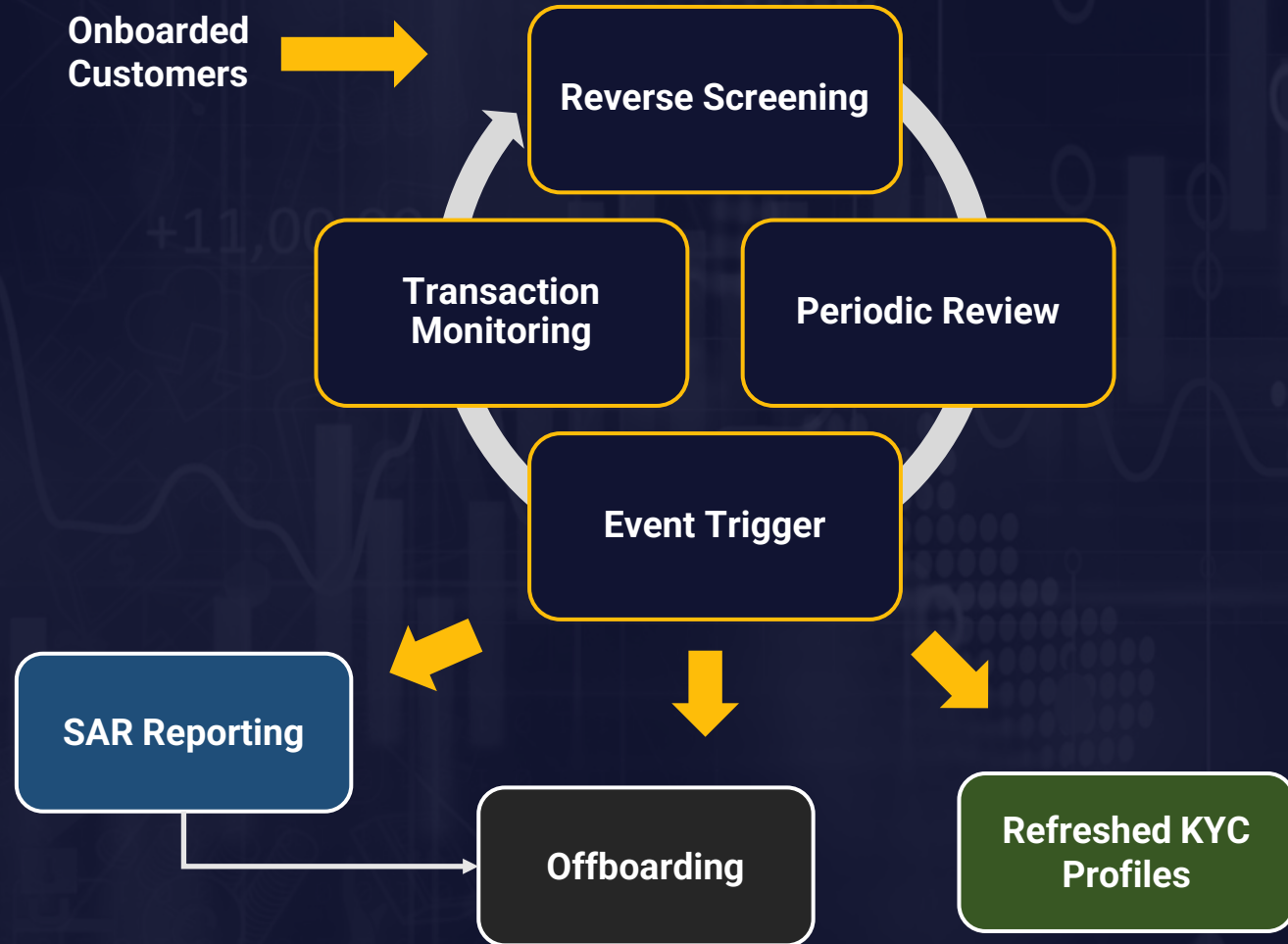
## Approval and Escalation Process







## Ongoing Due Diligence





Himalaya Exchange

Case 1:23-cr-00118-AT

Himalaya Dollar

Document 208-2

Himalaya Coin

Filed 12/21/23

Himalaya Pay

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Support

Login

Register

中文

Demonstration of the

## Client Onboarding and Compliance Process

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Himalaya Exchange is the world's first true crypto ecosystem.

Driven by our mission to give you back the power and redefine currency. We want you to

create with us. Himalaya Dollar and Himalaya Coin are how we'll take you to the top. It's time

to create the future with the world's first true crypto ecosystem. Everyone. borderless, inclusive and secure.

Trade and invest anytime, anywhere on the most trusted cryptocurrency exchange.

Thank you.

This is just the beginning.

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